

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

<b>IN RE:</b>	§	
	§	
ERICA SELESTE LEQUET	§	CAUSE NO. 22-10069
<b>DEBTOR</b>	§	(CHAPTER 7)

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ERICA SELESTE LEQUET	§	
<b>PLAINTIFFS</b>	§	ADV. NO. 22-01002
	§	
VS.	§	
	§	
KEVIN AND DANA WALDREP, AKA	§	
PERDLAW LLC	§	
<b>DEFENDANT(S)</b>		

**DEFENDANT'S ANSWER TO COMPLAINT**

COMES NOW, KEVIN AND DANA WALDREP, aka PERDLAW LLC, Debtor/Defendant and files this their Answer to the Complaint, filed herein by ERICA SELESTE LEQUET. In support thereof, Defendant submits the following:

1. Defendant denies the allegations contained in paragraph 1 of said complaint.
2. Defendant admits the allegations contained in paragraph 2 of said complaint.
3. Defendant denies the allegations contained in paragraph 3 of said complaint, but the lease expired on June 30, 2022 and the Defendants elected not to extend the lease to Plaintiff.
4. Defendant admits the allegations contained in paragraph 4 of said complaint.
5. Defendant admits the allegations contained in paragraph 5 of said complaint.
6. Defendant admits the allegations contained in paragraph 6 of said complaint.
7. Defendant admits the allegations contained in paragraph 7 of said complaint.
8. Defendant admits the allegations contained in paragraph 8 of said complaint.
9. Defendant denies the allegations contained in paragraph 9 of said complaint.
10. Defendant denies the allegations contained in paragraph 10 of said complaint.
11. Defendant denies the allegations contained in paragraph 11 of said complaint.
12. Defendant denies the allegations contained in paragraph 12 of said complaint.

13. Defendant denies the allegations contained in paragraph 13 of said complaint.

WHEREFORE, Defendant prays that the relief sought by the Plaintiff be denied, and that they have such other and further relief as is just.

DATED: July 11, 2022

Respectfully submitted,

**MAIDA CLARK LAW FIRM, P.C.**  
**4320 Calder Avenue**  
**Beaumont, Texas 77706**  
**(409) 898-8200; Fax No. (409) 898-8400**

BY: /s/ Tagnia F. Clark  
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**ATTORNEYS FOR DEFENDANT(S)**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing Answer has been properly forwarded to the Plaintiff by electronic mail, on this the 11th day of July 2022.

/s/ Tagnia F. Clark

Tagnia F. Clark

Erica Seleste Lequet, Pro Se Plaintiff

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